STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS PUBLIC UTILITIES COMMISSION

IN RE: PROVIDENCE GAS COMPANY BUSINESS CHOICE TARIFFF

DOCKET NO. 2902

REPORT AND ORDER

On April 1, 1999, the Providence Gas Company ("ProvGas" or

"Company") filed with the Public Utilities Commission ("Commission")

proposed tariff changes and supporting exhibits related to existing

transportation services under the Company's Business Choice Program.

The filing proposed enhancements to the Company's Business

Choice Program, which allows Medium, Large, and Extra Large

Commercial and Industrial ("C & I") customers to obtain their gas supply

from competitive marketers. The filing is a continuation of a process of

offering choice to customers that began with the Company's rate design

proceedings in Dockets No. 2076, 2374, and 2552. The filing specifically

proposed to:

• Replace the existing bi-annual enrollment windows with an open

enrollment process that would allow customers to enroll in the

program throughout the year ("rolling enrollment");

• Waive the mandatory capacity assignment requirement for <u>new</u> Large

and Extra Large Commercial and Industrial customers who meet

specific exemption criteria;

Eliminate the annual transportation factor update for Large and Extra

Large C&I customers;

- Eliminate its Standby Services;
- Modify the existing transportation terms and conditions to clarify the requirements of the tariff including the rights and responsibilities of ProvGas, customers and marketers; and
- Replace the current Transportation Service Agreement with a simplified, one-page Transportation Service Application.

In support of the filing, the Company submitted the prefiled testimony of Peter Czekanski, Director of Pricing for ProvGas. (Company Exhibit 1.) The filing was for effect at May 1, 1999. By order dated April 19, 1999, the Commission suspended the effective date of the original filing for a period of six months.

On August 2, 1999, a Settlement Agreement ("Settlement")¹ was filed with the Commission. (Joint Exhibit 1.) The parties to the Settlement included the Company, the Division of Public Utilities and Carriers ("Division") and The Energy Council—Rhode Island ("TEC-RI"). This Settlement was only partial in nature, and it provided for:

- A rolling enrollment process to allow customers to enroll in transportation services throughout the year, in place of the existing biannual enrollment;
- The Company supplying the parties with a preliminary estimate of pipeline path costs and the weighted, system-wide average costs on or about August 1;

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¹ A copy of the Settlement is attached as Appendix A hereto and incorporated by reference herein.

- The filing of final pipeline path costs and weighted, system-wide average costs at September 1; and
- The removal from the original filing of the Company's proposals
 relating to capacity assignment associated with FT-1 Large and Extra
 Large customers; however, the parties agreed to continue analysis and
 discussion of this item and to report back to the Commission on this
 matter.

Following notice, a public hearing was conducted at the offices of the Commission, 100 Orange Street, Providence, Rhode Island, on August 25, 1999. The following appearances were entered:

FOR THE COMPANY: Dennis J. Duffy, Esq.

FOR THE DIVISION: Paul J. Roberti, Esq.

Assistant Attorney General

FOR THE COMMISSION: Steven Frias

Senior Legal Counsel

FOR TEC-RI: Andrew Newman, Esq.

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At the hearing two witnesses were called: Peter Czekanski, the Director of Pricing at Providence Gas Company, and Bruce Oliver, a consultant for the Division in this proceeding.

Mr. Oliver prefiled testimony for the Division in this Docket. (Division Exhibit 1.) Mr. Oliver's testimony noted that 1,671 customers were participating in the ProvGas Business Choice Program, representing about half of the eligible customers. The Division supported the rolling

enrollment process, elimination of Standby Service, and the new, streamlined Transportation Service Application. However, Mr. Oliver expressed concerns with the Company's proposal to modify its capacity assignment procedures, as he stressed the importance of maintaining the ties between individual customers and capacity assignments to serve those customers. In regard to rolling enrollment, he testified that it would provide two significantly beneficial aspects: (1) it allows the work associated with the transfer of customers to be distributed throughout the year as opposed to a few brief periods each year; and (2) it gives customers more flexibility in determining the timing of enrollment thereby providing customers with the opportunity to go to the market throughout the year. (August 25, 1999 Hearing Transcript pp. 13-14.)

In their Settlement, the parties agreed to the Company's proposed rolling enrollment with modifications to the tariff schedules. The parties also agreed that the issues associated with the Company's proposed optional pipeline capacity assignment for new loads and the proposed fixing of capacity assignment factors for FT-1 Large and Extra Large customers would be bifurcated to be discussed and resolved in the future. The parties further agreed that the Company will provide the settling parties and marketers with a preliminary update of its pipeline path costs and weighted system-wide average costs.

In an open meeting on August 31, 1999, the Commission considered the evidence presented in the case and found that the

Settlement was just and reasonable and in the best interest of the ratepayers. The Commission approved the Settlement for effect at September 1, 1999.

The parties continued negotiations on the Company's proposals for capacity assignment associated with FT-1 Large and Extra Large customers. On October 8, 1999, the parties jointly filed a Supplemental Settlement Agreement ("Supplemental Settlement").² (Joint Exhibit 1-A.) A public hearing was conducted at the offices of the Commission, 100 Orange Street, Providence, Rhode Island on October 25, 1999. The following appearances were entered:

FOR THE COMPANY: Dennis J. Duffy, Esq.

FOR THE DIVISION: Paul J. Roberti, Esq.

Assistant Attorney General

FOR THE COMMISISON: Steven Frias

Senior Legal Counsel

The Supplemental Settlement afforded <u>new</u> Large and Extra Large FT-1 transportation customers the option of waiving the Company's mandatory assignment of firm upstream pipeline capacity. However, customers electing such a waiver will be ineligible to subsequently switch to the Company's firm sales service. To protect capacity-exempt customers in the event a supplier stops delivering gas on their behalf, these customers will have access to two new default services. The first service is a Short-Notice Service that will be available to customers upon

² A copy of the Supplemental Settlement is attached as Appendix B hereto and incorporated by reference.

24 hours notice to ProvGas and would be used by customers with an immediate need for a new supplier. The second service is an Advanced-Notice Service that requires notification to ProvGas no less than three business days before the start of the calendar month. This service would be used by customers who have advance knowledge of a change in their supplier, but are unable to contract with a new supplier before the existing service is terminated. The gas supply for these default services will be provided by Duke Energy Trading and Marketing ("Duke"). Duke currently provides the entire gas supply portfolio to ProvGas' firm customers. A Price Sheet that is to be filed with the Commission annually governs the pricing of the default services.

The Supplemental Settlement provided that customers transporting prior to November 1, 1997, who were given the option of waiving capacity assignment and elected the waiver, are considered "grandfathered" customers and will likewise be ineligible to return to the Company's firm sales service with one exception. The Company will give each "grandfathered" transportation customer a one-time opportunity to take an assignment of pipeline capacity prior to restricting their eligibility to return to the Company's firm sales service. In addition, the two new default services will be available to these "grandfathered" customers and the Company will give these customers direct notice regarding the availability of these default services.

Also, the Supplemental Settlement required that the Company provide the settling parties and marketers with a preliminary update of its pipeline path costs and weighted system-wide average costs on or about June 1 of each year. The information provided by the Company will include supporting schedules incorporating the assumptions and methodologies used to develop the rates so that marketers can assess the effect of market conditions on the transportation rates. Furthermore, the settling parties agreed that final pipeline path costs and weighted system wide average costs will continue be filed on September 1 as part of the Company's Gas Charge Clause filing.

Finally, the Supplemental Settlement resolved a number of other issues raised in the filing:

- The current FT-1 and FT-2 monthly aggregation pool charges would remain at \$150 and \$450, respectively;
- The Company will no longer incur the direct cost associated with marketers accessing the Company's Electronic Bulletin Board; instead, marketers will be billed directly by the administrator of the Company's Electronic Bulletin Board;
- The Company will continue to recalculate annually transportation factors for all transportation customers except for those exempt from a capacity assignment; and
- The Company will evaluate and address the option of allowing <u>all</u>
 Large and Extra Large FT-1 customers to waive a Company pipeline

capacity assignment as part of its next filing. The Company stated it intended to make such a filing no later than June 1, 2000.

At an open meeting on October 27, 1999, the Commission considered the evidence presented in the case and found the Supplemental Settlement was just and reasonable and in the best interest of the ratepayers. The Commission approved the Supplemental Settlement for effect at November 1, 1999.

Accordingly, it is

(16029) ORDERED:

- 1. The April 1, 1999 filing by Providence Gas Company is hereby denied and dismissed.
- 2. The Settlement Agreement filed August 2, 1999 among the Providence Gas Company, the Division of Public Utilities and Carriers and The Energy Council—Rhode Island is approved for effect at September 1, 1999.
- 3. The Supplemental Settlement Agreement filed October 8, 1999 among the Providence Gas Company, the Division of Public Utilities and Carriers, and The Energy Council—Rhode Island is approved for effect at November 1, 1999.
- 4. The changes to the tariffs and transportation terms and conditions filed with the Settlement Agreement and the Supplemental Settlement Agreement are hereby approved.

5. Providence Gas Company shall comply with all other requirements, terms and conditions imposed by the Settlement Agreement, the Supplemental Settlement Agreement and this Report and Order.

EFFECTIVE AT PROVIDENCE, RHODE ISLAND, PURSUANT TO OPEN MEETING DECISIONS ON AUGUST 31, 1999 AND OCTOBER 27, 1999. WRITTEN ORDER ISSUED JANUARY 13, 2000.

PUBLIC UTILITIES COMMISSION

Kate F. Racine, Commissioner

Brenda K. Gaynor, Commissioner

APPENDIX A

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

PUBLIC UTILITIES COMMISSION

Providence Gas Company)	
)	Docket No. 2902
)	

SETTLEMENT AGREEMENT

The Providence Gas Company ("ProvGas" or the "Company"), the Division of Public Utilities and Carriers and The Energy Council of Rhode Island (together, the "Settling Parties") have reached partial agreement on the Company's Rolling Enrollment filing, and hereby jointly request the Company's proposals for capacity assignment associated with FT-1 Large and Extra Large customers be bifurcated for further discussion and analysis and request Commission approval of this Settlement and the accompanying revised tariffs.

I. PREAMBLE

A. Introduction

The Company's Rolling Enrollment filing is a continuation of a process that began with the Company's rate design proceedings in Docket No. 2076, Docket No. 2374, and Docket No. 2552. Specifically, this filing proposes to: (1) replace the existing biannual enrollment windows with an open enrollment process that allows customers to enroll in the program throughout the year; (2) waive the mandatory capacity assignment requirement for new Large and Extra Large Commercial and Industrial (C&I) customers who meet specific exemption criteria; (3) eliminate the annual transportation factor update for Large and Extra Large C&I customers; (4) eliminate standby service; and (5)

modify the existing transportation terms and conditions to clarify the requirements of the tariff including the rights and responsibilities of ProvGas, customers and marketers.

B. Procedural History

On April 1, 1999, the Company filed (the "Filing") its proposed tariffs and supporting exhibits to modify tariff provisions for existing service. Subsequent to the Company's Filing, the Commission initiated a proceeding (Docket No. 2902), and petitions for intervention were filed and deemed granted pursuant to Rule 1.13(e) of the Commission's Rules of Practice and Procedure on behalf of the following entities: (1) the Division of Public Utilities and Carriers (the "Division"); and (2) The Energy Council of Rhode Island ("TEC-RI"). The Company published notice of the filing on April 3, 1999.

II. TERMS OF SETTLEMENT

The terms of settlement are as appear below and include the following exhibits: Exhibit 1, a marked version reflecting changes from the Company's previously proposed tariffs; and Exhibit 2, a clean version of the proposed tariffs.

A. Rolling Enrollment

The Settling Parties agree that the proposed rolling enrollment, as revised by the modifications set forth below, is reasonable for purposes of this proceeding and should be approved by the Commission. Modifications to the proposed tariff schedules, as agreed to by the Settling Parties, include the following:

1. <u>Capacity Assignment Changes:</u>

The Settling Parties agree that the issues associated with the Company's proposed optional pipeline capacity assignment for new loads and the proposed fixing of capacity assignment factors for Large and Extra Large FT-1 customers should be bifurcated from the rest of the proposal. Such bifurcation would allow for an expedited approval and implementation of all other elements in the Company's proposal while providing

additional time to discuss and analyze the various policy issues raised by the proposed capacity assignment changes. The Settling Parties intend to address the proposed capacity exemption changes and other transportation related issues in a settlement agreement and/or testimony to be filed with the Commission on or about September 1, 1999.

2. <u>Calculation of Pipeline Path Costs and Weighted System-Wide</u> Average Costs:

The Settling Parties agree that the Company will provide the Settling Parties and marketers with a preliminary update of its pipeline path costs and weighted system-wide average costs on or about August 1. This will include supporting schedules that show the assumptions and methodologies used to develop the rates such that marketers can accurately assess the impact of changing market conditions on the transportation rates. The Settling Parties also agree that final pipeline path costs and weighted system-wide average costs will continue to be filed on September 1 as part of the Company's Gas Charge Clause filing. The Settling Parties intend to discuss providing the Settling Parties and marketers with pipeline path costs and weighted system-wide average costs prior to August 1st in an effort to provide marketers with more timely information regarding such costs.

B. Tariffs

As agreed to by the Settling Parties, the proposed tariffs include several modifications from the tariff initially proposed by the Company, as described below.

1. Weighted Average Upstream Pipeline Transportation Cost:

The tariff in Section 2, Schedule A, Item 12.0 has been modified to state that the Company will provide marketers and the Division with a preliminary update of the pipeline path costs and weighted system-wide average costs on or about August 1.

2. <u>Capacity Release</u>:

Proposed language, which would exclude Large and Extra Large FT-1 customers from an annual review of pipeline capacity requirements, has been removed from Section 5, Schedule E, Item 1.08. Additionally, the proposed Item 1.08.1 in Section 5, Schedule E and the definition of New Customer in Item 1.01 have been deleted. Such provisions would have made assignment of capacity optional for new loads classified as FT-1 Large or Extra-Large.

III. EFFECT OF SETTLEMENT AGREEMENT

This Agreement is the result of a negotiated settlement among the Settling Parties. The discussions which have produced this Settlement have been conducted on the explicit understanding that all offers of settlement and discussions relating hereto are and shall be privileged, shall be without prejudice to the position of any party or participant presenting such offer or participating in any such discussion, and are not to be used in any manner in connection with these or other proceedings involving any one or more of the parties to this Settlement or otherwise. The Agreement by a party to the terms of this Agreement shall not be construed as an agreement as to any matter of fact or law for any other purpose. The terms of the Agreement shall not serve as a precedent to any matter of fact or law beyond the terms hereof. In the event that the Commission (i) rejects this Agreement, (ii) fails to accept this Agreement as filed, or (iii) accepts this Agreement subject to conditions unacceptable to any party hereto, then this Agreement shall be deemed withdrawn and shall be null and void in all respects.

IN WITNESS WHEREOF, the parties agree that this Agreement is reasonable

and have caused this document to be executed by their respective representatives, each

being fully authorized to do so. Dated at Providence this 2nd day of August, 1999.

Respectfully submitted,

DIVISION OF PUBLIC UTILITIES AND CARRIERS

Paul Roberti.

Special Assistant Attorney General

150 South Main Street

Providence, RI 02903

Providence Gas Company

By its Attorney,

Susann G. Mark

Vice President, General Counsel,

and Secretary

The Energy Council Of Rhode Island

By its Executive Director.

Roger Buck

P.O. Box 3235

Newport, RI 02840

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Appendix B

PUBLIC UTILITIES COMMISSION

Providence Gas Company)	Docket No. 2902
)	

SUPPLEMENTAL SETTLEMENT AGREEMENT

The Providence Gas Company ("ProvGas" or the "Company"), the Division of Public Utilities and Carriers and The Energy Council of Rhode Island (together, the "Settling Parties") have reached agreement on the Company's proposals for capacity assignment associated with FT-1 Large and Extra Large customers, and hereby jointly request Commission approval of this Supplemental Settlement and the accompanying revised tariffs.

I. PREAMBLE

A. Introduction

The Company's April 1, 1999 Rolling Enrollment filing is a continuation of a process that began with the Company's rate design proceedings in Docket No. 2076, Docket No. 2374, and Docket No. 2552. Specifically, this filing proposes to: (1) replace the existing biannual enrollment windows with an open enrollment process that allows customers to enroll in the program throughout the year; (2) waive the mandatory capacity assignment requirement for new Large and Extra Large Commercial and Industrial (C&I) customers who meet specific exemption criteria; (3) eliminate the annual transportation factor update for Large and Extra Large C&I customers; (4) eliminate standby service; and (5) modify the existing transportation terms and conditions to clarify the requirements of the tariff including the rights and responsibilities of ProvGas, customers and marketers.

B. Procedural History

On April 1, 1999, the Company filed (the "Filing") its proposed tariffs and supporting exhibits to modify tariff provisions for existing service. Subsequent to the Company's Filing, the Commission initiated a proceeding (Docket No. 2902), and petitions for intervention were filed and deemed granted pursuant to Rule 1.13(e) of the Commission's Rules of Practice and Procedure on behalf of the following entities: (1) the Division of Public Utilities and Carriers (the "Division"); and (2) The Energy Council of Rhode Island ("TEC-RI"). The Company published notice of the filing on April 3, 1999.

On August 2, 1999, the Settling Parties filed with the Commission a partial Settlement Agreement recommending approval of the Company's rolling enrolment filing, with the exception of the Company's proposals for capacity assignment associated with FT-1 Large and Extra Large customers. For those issues, the Agreement recommended that they be bifurcated for further discussion and analysis.

On August 25, 1999, the Commission conducted a hearing on the partial settlement in Docket No. 2902 and at an August 31, 1999 open meeting of the Public Utilities Commission, the partial settlement agreement was approved.

II. TERMS OF SUPPLEMENTAL SETTLEMENT

The terms of the supplemental settlement address outstanding issues in Docket No. 2902 and are as appear below. Such supplemental settlement includes the following exhibits: Exhibit 1, a price sheet for default transportation services; Exhibit 2, a marked tariff reflecting changes from the Company's currently effective tariffs; and Exhibit 3, a clean version of the proposed tariffs.

A. Capacity Assignment Changes

The Settling Parties agree that the proposed capacity assignment changes, as revised by the modifications set forth below, are reasonable, will promote growth on the system to the benefit of all sales customers and should be approved by the Commission.

Modifications to the proposed tariff schedules, as agreed to by the Settling Parties, include the following:

Capacity Assignment Waiver for New Large and Extra Large FT-1 Load:

The Settling Parties agree that new Large and Extra Large C&I FT-1 transportation customers shall have the option of waiving the Company's mandatory assignment of firm upstream pipeline capacity. The Settling Parties further agree that customers electing such waiver will be ineligible to subsequently switch to the Company's firm sales service.

To protect such capacity exempt customers in the event that their supplier stops delivering gas on their behalf, these customers will have access to two default services provided under an agreement with Duke Energy Trading and Marketing ("DETM") through September 2000. The Company intends to provide this service in subsequent periods through a similar arrangement with a wholesale marketer, making reasonable efforts to provide such service at rates based on market conditions. The first service is a Short Notice service that will be available to customers upon 24 hours notice to ProvGas. Customers with an immediate need for a new supplier could utilize this service. The second service is an Advance Notice service that requires notification to ProvGas no less than three (3) business days before the start of the calendar month. This service would be available to customers who have advance knowledge of a change in their supplier, but are unable to contract with a new supplier before their existing service is terminated. The default services are independent of the current supply agreement between the Company and DETM.

Attached as Exhibit 1 is the Default Transportation Service Price Sheet that identifies the pricing for these services. This pricing sheet will be reviewed annually by

the Company and Default Transportation Service supplier, and filed with the Commission concurrent with the Company's annual Gas Charge Clause filing.

Whereas, customers transporting prior to November 1, 1997 were also given the option of waiving capacity assignment, those "grandfathered" customers that elected the waiver will likewise be ineligible to return to the Company's firm sales service. Hence, the default services described above will also be available to these "grandfathered" customers. The Company will provide such customers with direct notice regarding availability of default services. In addition, the Company will give each "grandfathered" transportation customer a one-time opportunity to take an assignment of pipeline capacity prior to restricting their eligibility to return to Company firm sales service.

2. <u>Calculation of Pipeline Path Costs and Weighted System-Wide</u> <u>Average Costs:</u>

The Settling Parties agree that the Company will provide the Settling Parties and marketers with a preliminary update of its pipeline path costs and weighted system-wide average costs on or about June 1 of each year. This will include supporting schedules that show the assumptions and methodologies used to develop the rates such that marketers can accurately assess the impact of changing market conditions on the transportation rates. The Settling Parties also agree that final pipeline path costs and weighted system-wide average costs will continue to be filed on September 1 as part of the Company's Gas Charge Clause filing.

3. <u>Annual Transportation Factor Update for Large and Extra Large</u> <u>C&I Customers:</u>

The Settling parties agree that the Company will continue the annual recalculation of transportation factors for all transportation customers except for those exempt from a capacity assignment as identified in Section II, A.1 above.

B. Other Transportation Related Issues

1. Update Marketer Aggregation Pool Charges:

The Settling Parties agree that the current FT-1 and FT-2 monthly aggregation pool charges will remain at \$150 and \$450, respectively; and the Company will evaluate these charges and address any necessary changes in its next filing for further enhancements to the Business Choice program. Furthermore, the Settling Parties agree that the Company will no longer incur the direct cost associated with marketers accessing the Company's Electronic Bulletin Board ("EBB"). Marketers will be billed directly by the administrator of the Value Added Network ("VAN") which provides access to the EBB. The administrator offers several billing options including a variable rate, a flat monthly fee or a tiered rate with fixed and variable components. Currently, the tiered rate option includes a \$5.50 per hour variable charge plus a fixed monthly fee of either \$5 or \$10. The fixed monthly fee depends on the method of billing selected by the customer. The \$5 fixed fee reflects electronic billing while the \$10 fixed fee reflects billing via paper invoice. Marketers may select and negotiate directly with the administrator for the billing option that best meets their particular needs. Periodically, the Company will compare these fees to the charges for similar VAN services to ensure they are consistent with market pricing. These costs were not included in the development of the current aggregation pool charges.

Optional Capacity Assignment for All Large and Extra Large FT-1 Customers:

The Settling Parties agree that the Company will evaluate and address the option of allowing all Large and Extra Large FT-1 customers to waive a Company pipeline capacity assignment as part of its next filing for further enhancements to the *Business Choice* program. The Company intends to make such filing no later than June 1, 2000.

C. Tariffs

As agreed to by the Settling Parties, the proposed tariffs include several modifications from the Company's existing tariff, as described below.

1. Weighted Average Upstream Pipeline Transportation Cost:

The tariff in Section 2, Schedule A, Item 12.0 has been modified to state that the Company will provide marketers and the Division with a preliminary update of the pipeline path costs and weighted system-wide average costs on or about June 1.

2. <u>Capacity Release</u>:

Item 1.08.1 in Section 5, Schedule E and the definition of New Customer in Item 1.01 have been added. These changes provide new Large and Extra Large FT-1 customers with an option to waive the Company's mandatory assignment of pipeline capacity. In addition, Item 1.08 in Section 5, Schedule E clarifies that existing "grandfathered" customers are prohibited from returning to firm Company sales service.

3. Default Service:

Tariff pages for the default transportation services have been added as Item 2.04.0 in Section 5, Schedule E.

4. <u>Marketer Aggregation Pool Charge:</u>

Language has been added to Item 5.01 in Section 5, Schedule E to include the requirement that marketers establish an account with the VAN administrator to cover the direct costs associated with accessing and using the EBB.

III. EFFECT OF SUPPLEMENTAL SETTLEMENT AGREEMENT

This Supplemental Agreement is the result of a negotiated settlement among the Settling Parties. The discussions which have produced this Supplemental Settlement have been conducted on the explicit understanding that all offers of settlement and discussions relating hereto are and shall be privileged, shall be without prejudice to the position of any party or participant presenting such offer or participating in any such discussion, and are not to be used in any manner in connection with these or other proceedings involving any one or more of the parties to this Settlement or otherwise. The Agreement by a party to the terms of this Agreement shall not be construed as an agreement as to any matter of fact or law for any other purpose. The terms of the

Agreement shall not serve as a precedent to any matter of fact or law beyond the terms

hereof. In the event that the Commission (i) rejects this Agreement, (ii) fails to accept

this Agreement as filed, or (iii) accepts this Agreement subject to conditions unacceptable

to any party hereto, then this Agreement shall be deemed withdrawn and shall be null and

void in all respects.

IN WITNESS WHEREOF, the parties agree that this Agreement is reasonable

and have caused this document to be executed by their respective representatives, each

being fully authorized to do so. Dated at Providence this 7th day of October, 1999.

Respectfully submitted,

Providence Gas Company

By its Attorney,

Susann G. Mark

Vice President, General Counsel,

and Secretary

DIVISION OF PUBLIC UTILITIES AND CARRIERS

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The Energy Council Of Rhode Island

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